

UNITED STATES DISTRICT COURT

for the

FILED
RICHARD W. NAGEL
CLERK OF COURT

11/19/24

U.S. DISTRICT COURT
SOUTHERN DIST. OHIO
WEST. DIV. DAYTON

In the Matter of the Search of
*(Briefly describe the property to be searched
 or identify the person by name and address)*
 204 Hawthorn Street, Dayton, OH 45402
 for the person of Cy'ran Campbell

Case No.

3:24-mj-702

APPLICATION FOR A WARRANT BY TELEPHONE OR OTHER RELIABLE ELECTRONIC MEANS

I, a federal law enforcement officer or an attorney for the government, request a search warrant and state under penalty of perjury that I have reason to believe that on the following person or property *(identify the person or describe the property to be searched and give its location)*:

See Attachment A

located in the _____ Southern _____ District of _____ Ohio _____, there is now concealed *(identify the person or describe the property to be seized)*:

See Attachment B

The basis for the search under Fed. R. Crim. P. 41(c) is *(check one or more)*:

- ☐ evidence of a crime;
☐ contraband, fruits of crime, or other items illegally possessed;
☐ property designed for use, intended for use, or used in committing a crime;
☒ a person to be arrested or a person who is unlawfully restrained.

The search is related to a violation of:

<i>Code Section</i>	<i>Offense Description</i>
18 U.S.C. § 922(g)(1)	Felon in possession of a firearm

The application is based on these facts:
 See attached affidavit

- ☐ Continued on the attached sheet.
☐ Delayed notice of _____ days *(give exact ending date if more than 30 days: _____)* is requested under 18 U.S.C. § 3103a, the basis of which is set forth on the attached sheet.


 Applicant's signature


ATF SA Timur J. Housum

Printed name and title

Attested to by the applicant in accordance with the requirements of Fed. R. Crim. P. 4.1 by
 _____ telephone _____ *(specify reliable electronic means).*

Date: 11/19/2024

City and state: Dayton, Ohio


 Peter B. Silvain, Jr.
 United States Magistrate Judge



ATTACHMENT A

The location is residence, curtilage, and outbuildings located at 204 Hawthorn Street, Dayton, Ohio (the “SUBJECT PREMISES”), depicted below.



ATTACHMENT B

ITEMS TO BE SEIZED

Cy'ran CAMPBELL

DOB:2/21/2000

Social Security Number 293-04-8296

Approximate height 5'11"

Approximate weight 168 lbs



**IN THE UNITED STATES DISTRICT COURT
FOR THE SOUTHERN DISTRICT OF OHIO
Western Division**

IN THE MATTER OF SEARCH OF: : Crim. No. 3:24-mj-702
: :
The residence of 204 Hawthorn Street :
Dayton, Ohio 45402 for the person of :
Cy'ran CAMPBELL : **FILED UNDER SEAL**

AFFIDAVIT

I, Timur J. Housum, being first duly sworn, hereby depose and state as follows:

INTRODUCTION AND AGENT BACKGROUND

1. I am a Special Agent ("SA") in the Bureau of Alcohol, Tobacco, Firearms, and Explosives ("ATF"), and have been since July 2015. I graduated from the Federal Law Enforcement Training Center, Criminal Investigator School, and ATF Special Agent Basic Training Academy, located in Glynco, Georgia, in February of 2016. I previously served on the Dayton, Ohio, High Intensity Drug Trafficking Area (HIDTA) Task Force and I am currently assigned to an Organized Crime Task Force, which investigates criminal organizations in the Southern Judicial District of Ohio. Prior to my employment with ATF, I was an Officer with the Uniformed Division of the United States Secret Service from February 2011 through July 2015. I have received additional training in several areas of law enforcement, including but not limited to gang investigations, narcotics interdiction and investigation, and firearms interdiction and investigation.

As an ATF Special Agent, I have participated in the execution of search warrants involving the possession, sale, and use of firearms. I also have personally participated in firearm investigations, many of which involved arrests and/or the use of cooperating sources or

confidential informants. Based on my training and experience – including my participation in the investigations referenced above – as well as discussions and interactions with other experienced ATF special agents, I am familiar with the way individuals frequently store firearms and documents relating to the sale or disposition of their firearms. Specifically, I know:

- a. that individuals who own or possess firearms frequently store these weapons at their homes/businesses, or outbuildings associated with their homes/businesses, such as a garage/shed;
- b. that individuals who possess firearms often retain or own other items related to firearms, including, but not limited to: gun cases, ammunition, ammunition magazines, holsters, spare parts, cleaning equipment, photographs of firearms, and receipts documenting the purchase of these items;
- c. that individuals who own or possess guns frequently keep these items for extended periods of time given the durability and expense of firearms;
- d. that individuals keep or possess in their residences, businesses, other real property and vehicles over which they have dominion and control, documents and items which indicate their occupancy and/or ownership such as:
 - personal mail, checkbooks, identification, notes, correspondence, utility bills, rent receipts, payment receipts, financial documents, keys, photographs, leases, mortgage bills, vehicle registration information, ownership warranties, receipts for vehicle parts and repairs and telephone answering machine introductions.
 - cameras and/or digital recording devices and/or containers of undeveloped photographic film, containing photographs (when developed) of themselves occupying the property and vehicles.
- e. that individuals who sell firearms as a business, whether with or without a license, frequently document their sales either in the form of receipts or computerized records; additionally, these individuals typically maintain books, U.S. currency, notes, ledgers, computers, computer disk, pagers, cellular telephones, money orders, IOU's, buyer/seller lists, and other papers, all relating to the sale, transportation, ordering, possession, and/or distribution of firearms.

2. I make this affidavit in support of an application for a warrant to search 204 Hawthorn Street, Dayton, OH 45402 (the “SUBJECT PREMISES”), further described in Attachment A, for Cy’ran CAMPBELL (“CAMPBELL”), further described in Attachment B, for being a felon in possession of a firearm, in violation of Title 18 U.S.C. § 922.

3. Based on my training and experience, as well as the facts contained in the affidavit, I submit there is probable cause to believe CAMPBELL is either residing at or will be located at the SUBJECT PREMISES. The facts and information contained in this affidavit are based on my personal knowledge, my training and experience, my interviews of various witnesses, including law enforcement personnel who participated in this investigation, and my review of certain records, documents, audio recordings, and video recordings.

PROBABLE CAUSE

4. On October 22, 2024, a federal grand jury for the Southern District of Ohio returned an indictment against CAMPBELL for being a felon in possession of a firearm, in violation of Title 18, United States Code, §§922(g)(1) and 924(a)(8) (see Case No. 3:24-cr-87). The Honorable Thomas M. Rose issued a warrant for CAMPBELL’s arrest on the same day. The warrant remains active.

5. On October 31, 2024, SA Housum observed CAMPBELL’s Audi Q7 (Ohio license plate JAT8065) parked northbound on Hawthorn Street in front of an apartment complex that includes, among other apartments and condos, the SUBJECT PREMISES. The Audi Q7 parked on Hawthorn Street in front of the apartment complex is the same vehicle CAMPBELL was stopped driving on October 9, 2024 – the date of the offense charged in the indictment.

6. The SUBJECT PREMISES is registered to a third-party. The relationship between the owner and CAMPBELL is unclear. SA Housum conducted surveillance of the SUBJECT PREMISES from October 31, 2024, through November 19, 2024.

7. SA Housum observed a wire coming from below the second-floor window of the SUBJECT PREMISES. The wire appears to be connected to a security camera in the northwest corner overlooking the front doorsteps and the area the Audi Q7 is typically parked.

8. CAMPBELL has been observed entering and exiting the SUBJECT PREMISES multiple times on multiple days over the last three weeks. CAMPBELL's Audi Q7 is frequently parked in front of the apartment complex that includes the SUBJECT PREMISES, including overnight. Based on my observations, training, and experience, there is probable cause to believe CAMPBELL is either residing at the SUBJECT PREMISES or is a frequent overnight guest of the registered owner.


CONCLUSION

9. Based on the foregoing, your affiant respectfully submits that there is probable cause to believe CAMPBELL, further described in Attachment B, can be located at the SUBJECT PREMISES, further described in Attachment A.



Timur J. Housum
ATF Special Agent
Dayton, OH

Subscribed and sworn to me this 19th day of November 2024.


Peter B. Silvain, Jr.
United States Magistrate Judge

ATTACHMENT A

The location is residence, curtilage, and outbuildings located at 204 Hawthorn Street, Dayton, Ohio (the “SUBJECT PREMISES”), depicted below.



ATTACHMENT B

ITEMS TO BE SEIZED

Cy'ran CAMPBELL

DOB:2/21/2000

Social Security Number 293-04-8296

Approximate height 5'11"

Approximate weight 168 lbs

